UNITED STATES DISTRICT COURT

Claire Hall, et al. Plaintiffs, v.

Case No.: 1:23-cv-00359-MSM-PAS

South Kingstown Police Department, et al. Defendants.

AFFIDAVIT OF MATTHEW MOYNIHAN

FOR THE DISTRICT OF RHODE ISLAND

- I, Matthew Moynihan, do depose and state, under oath, as follows:
 - 1. I am the Chief of Police for the Town of South Kingstown.
 - 2. On or about September 1, 2023, I read in the news about a federal lawsuit filed against the South Kingstown Police Department.
 - 3. On the same day, I called South Kingstown Assistant Solicitor Peter Skwirz about the matter.
 - 4. On the same day, I was sent a copy of the complaint by Assistant Solicitor Skwirz.
 - 5. The Town was served with a copy of the complaint on September 7, 2023.
 - 6. I assumed that no further action needed to be taken on my part, as Assistant Solicitor Skwirz was already aware of the complaint, as he had previously sent it to me on or about September 1, 2023.
 - 7. On or about October 10, 2023, I called Assistant Solicitor Skwirz to discuss a public records request made to the Town of South Kingstown regarding this matter.
 - 8. In that phone call, Assistant Solicitor Skwirz suggested that I should discuss this with the legal counsel assigned to this matter by the Town's insurance carrier.
 - 9. In following up with the Town's insurance carrier to do so, it was determined that no answer had been filed in this matter, at which point I spoke with Paul Dutra from the Town's insurance carrier and Assistant Solicitor Skwirz regarding the same.

Matthew Moynihan,

Chief of Police

Town of South Kingstown

Subscribed and sworn before me on the 11^{th} day of October, 2023.

MARY E. WRIGHT **NOTARY PUBLIC**

STATE OF RHODE ISLAND COMM. EXP. 4/3/025 COMM. # 47903

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